

Colchester Borough Council
Publication of the Site Allocations Submission Document
Soundness Self-Assessment

September 2009

The soundness self-assessment for the Site Allocations Submission Document contains a number of components as recommended by the Planning Advisory Service.

To date the self-assessment includes up to and including Stage 4: Publication. The self-assessment will be further updated after representations made at the publication stage have been received and collated by the Council. Once representations have been received the Council will update the self-assessment with Stage 5: Submission prior to the Site Allocations document being sent to the Secretary of State who will appoint a Planning Inspector to conduct the Examination in Public.

Components of the self-assessment

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Legal compliance

Stage 1: Inception

Activity	Legal Requirement	Guidance Reference	Additional Notes	Possible evidence	Evidence provided
1. Is the development plan document identified in the adopted local development scheme and have you recorded the timetable for its production?	The Act section 15(2); section 19(1)	PPS12 paragraphs 4.50; 4.53-4.58	Milestones are set out in PPS12 (box after paragraph 4.55).	i. The adopted local development scheme at the time of: <ul style="list-style-type: none"> • commencement of the development plan document • the published development plan document • the submitted development plan document ii. The relevant annual monitoring report (if changes need to be explained)	The Council have regularly reviewed and kept up to date with the milestones outlined. The LDS 2007 shows work on the Site Allocations document starting winter 2006 with the first round of consultation for November 2007
2. Have you considered how community	1. The Act section 19(3)	PPS12 paragraphs 4.19-4.29	Unless the statement of community involvement has	i. The statement of community involvement	The Council's SCI adopted in 2006 guides the community

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engagement will be programmed into the preparation of the development plan document?	2. Regulation 25		been amended, you may need to set out any changes to community engagement as a result of changes in legislation.	ii. The project plan for the development plan document	engagement to assist with the production of the Site Allocations document. Following the publication of new regulations in 2008 the SCI was modified to reflect these changes. The SCI has been a key consideration in the formulation of the Site Allocations document.
3. Have you considered the appropriate bodies you should consult?	Regulation 25	1. PPS12 paragraphs 4.25 -4.26 2. Plan Making Manual – Consultee list	Regulation 2 defines the general and specific consultation bodies	i. The statement of community involvement ii. Reports and decisions setting out the approach to be taken to specific and general consultation bodies iii. Consultation	Under the previous regulations the Council considered it appropriate to consult all bodies, stakeholders and members of the public for any development plan document. This activity has continued under the new regulations in line with the adopted SCI.

Activity	Legal Requirement	Guidance Reference	Additional Notes	Possible evidence	Evidence provided
				statement	
4. Is baseline information being collected and evidence being gathered to keep the matters which affect the development of the area under review?	The Act, section13	PPS12 paragraphs 4.36 – 4.47		<ul style="list-style-type: none"> i. Documents dealing with collection of baseline information ii. Relevant technical studies iii. The annual monitoring report 	Monitoring and research is a key activity that the Council is continually undertaking to inform the Annual Monitoring Report. Alongside the AMR the Council is continually adding documents to the comprehensive evidence base and updating these periodically when necessary.
5. Is baseline information being collected and evidence being gathered to set the framework for the sustainability appraisal?	The Act section19(5)	<ul style="list-style-type: none"> 1. PPS12 paragraphs 4.50; 4.39-4.43 2. Strategic Environmental Assessment 		<ul style="list-style-type: none"> i. Sustainability report scoping document ii. Sustainability appraisal report 	Alongside the production of the Site Allocations document the Council undertook a Sustainability Appraisal Report which was subject to a five week

Activity	Legal Requirement	Guidance Reference	Additional Notes	Possible evidence	Evidence provided
		Guide, chapter five			consultation period. The findings of the AMR also assist with the collection of baseline information to inform the Sustainability Appraisal.
6. Have you consulted the statutory environment consultation bodies for five weeks on the scope and level of detail of the environmental information to be included in the sustainability appraisal report?	Regulations 9 and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633.	PPS12 paragraph 4.40 SEA Guide Ch 3	The Strategic Environmental Assessment consultation bodies are also amongst the 'specific consultation bodies' which are defined in Regulation 2)	Copies of the consultation letters sent to the bodies	The statutory consultation bodies are a key partner in the formulation and delivery of all aspects of the Colchester LDF. A scoping report was published alongside the Issues and Options consultation (November 2007) and a revised scoping report was published alongside the Regulation 25 consultation document (January

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					2009) and the findings from these played a key role in further informing the Site Allocations document.

Stage 2: Plan preparation - frontloading phase

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1. Have you notified the specific consultation bodies that have an interest in the subject of the development plan document and invited them to make representations about its contents?	Regulation 25(1) and (2)(a)	PPS12 paragraphs 4.24 – 4.29	Specific consultation bodies are defined in Regulation 2 If any bodies are omitted, you should give a clear justification for doing so, including reference to the SCI.	<ul style="list-style-type: none"> i. Consultation statement ii. Copies of documents consulting these bodies iii. Record of discussions iv. Copies of representations made v. A brief statement setting out the reasons why any bodies have been omitted from consultation 	The Council started production of the Site Allocations document under the previous regulations and notified everybody on the LDF Contact Database that a consultation period was taking place. In order to ensure consistency following the introduction of the new regulations both those on the specific consultation bodies and the general consultation bodies list were notified during the Regulation 25 and 27 Consultation periods. A summary of the consultation responses received can be found in the reports to LDF Committee for

Activity	Legal Requirement	Guidance Reference	Additional Notes	Possible evidence	Evidence provided
					17 th March 2008 and 23 rd March 2009 as well as the Site Allocations Statement of Consultation.
2. Have you notified the general consultation bodies that you consider have an interest in the subject of the development plan document and invited them to make representations about its contents?	Regulation 25(1) and (2)(b)	PPS12 paragraphs 4.24 – 4.29	General consultation bodies are defined in Regulation 2. You should be able to give a clear justification for your selection of the bodies, including reference to the statement of community involvement.	<ul style="list-style-type: none"> i. Consultation statement ii. Copies of documents consulting these bodies iii. Record of discussions iv. Copies of representations made v. A brief statement setting out the reasons why any bodies were or were not included 	The Council started production of the Site Allocations document under the previous regulations and notified everybody on the LDF Contact Database that a consultation period was taking place. In order to ensure consistency following the introduction of the new regulations both those on the specific consultation bodies and the general consultation bodies list were notified during the Regulation 25 and 27 Consultation periods. A summary of the consultation

Activity	Legal Requirement	Guidance Reference	Additional Notes	Possible evidence	Evidence provided
					responses received can be found in the reports to LDF Committee for 17 th March 2008 and 23 rd March 2009 as well as the Site Allocations Statement of Consultation.
3. Are you inviting representations from people resident or carrying out business in your area about the content of the development plan document?	Regulation 25(3)	PPS12 paragraphs 4.24 – 4.29		<ul style="list-style-type: none"> i. Consultation statement ii. Copies of documents consulting these persons iii. Record of discussions iv. Copies of representations made 	The Council started production of the Site Allocations document under the previous regulations and notified everybody on the LDF Contact Database that a consultation period was taking place. In order to ensure consistency following the introduction of the new regulations both those on the specific consultation bodies and the general consultation bodies list were notified during the Regulation

Activity	Legal Requirement	Guidance Reference	Additional Notes	Possible evidence	Evidence provided
					25 and 27 Consultation periods. A summary of the consultation responses received can be found in the reports to LDF Committee for 17 th March 2008 and 23 rd March 2009 as well as the Site Allocations Statement of Consultation.
4. Are you engaging with stakeholders responsible for delivery of the strategy?	Regulation 25	PPS12 paragraphs 4.4; 4.27 – 4.29; 4.45	PPS12 paragraph 4.29 gives examples of relevant delivery agencies	<ul style="list-style-type: none"> i. Consultation statement ii. Copies of documents consulting these people iii. Record of discussions 	The Council recognised the importance of engaging with stakeholders during the production and successful adoption of the Core Strategy and this has continued during the Site Allocations document. Stakeholders have been invited to respond to consultations at every stage and where necessary their

Activity	Legal Requirement	Guidance Reference	Additional Notes	Possible evidence	Evidence provided
					expertise has been sought on technical matters and issues during the formulation of the document.
5. Are you taking into account representations made?	Regulation 25(5)	PPS12 paragraphs 4.19-4.29; 4.37	Evidence from participation is part of the justification	<ul style="list-style-type: none"> i. Consultation statement ii. Any reports on the selection of alternatives and options for the development plan document 	Consultation and the responses received at every stage have been taken into account during the production of the Site Allocations document. The Regulation 25 document contained alternative options for each of the sites contained within it.
6. Does the consultation contribute to the development and sustainability appraisal of alternatives?	<ul style="list-style-type: none"> 1. The Act section 19(5) 2. Regulations 12 and 13 of The Environmental Assessment of Plans and 	<ul style="list-style-type: none"> 1. PPS12 paragraphs 4.39-4.43 2. SEA Guide, chapter three 		<ul style="list-style-type: none"> i. Consultation statement ii. Any reports on the selection of alternatives and options for the development plan document 	During each consultation period the Council has also published a Sustainability Appraisal which has considered all reasonable alternatives. Details of

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	Programmes Regulations 2004 No 1633.			iii. Sustainability appraisal report	consultation responses specifically on the Sustainability Appraisal can also be found in the Consultation Statement.
7. Is the participation: <ul style="list-style-type: none"> • following the principles set out in your statement of community involvement • integrating involvement with the sustainable community strategy • proportionate to the scale of issues involved in the development plan document? 	1. The Act s.19(3) 2. Regulation 25	PPS12 paragraphs 4.19 – 4.26; 4.42		i. Consultation Statement ii. The statement of community involvement iii. The relevant sustainable community strategies	The Site Allocations document considers the whole Borough and will (along with the Proposals Map) allocate areas of land to aid the future development of the Borough in line with the Core Strategy. As a result the Council consider it appropriate to undertake a full consultation as this is proportionate to the scale of the issues covered within the document.
8. Are you keeping a record of: <ul style="list-style-type: none"> • the individuals or 	Regulation 24	PPS12 paragraphs 4.24 – 4.29	You will need to submit a statement of representations	i. Consultation statement ii. Reports by the	Following the closure of each consultation period the Council

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<p>bodies invited to make representations</p> <ul style="list-style-type: none"> • How this was done • The main issues raised? 			<p>under Regulation 30(1)(d): see Submission stage below.</p> <p>Regulation 49 deals with the availability of documents and the time of their removal</p>	<p>council on the consultation</p> <p>iii. Copies of representations and relevant correspondence</p> <p>iv. Technical reports on the engagement process</p>	<p>summarises the representations and presents this report to LDF Committee. The Consultation statement also outlines the processes that were undertaken during the consultation period and both of these documents are always available on the Council's website for public access. All representations are available for viewing upon request to officers.</p>
<p>9. Are you developing a framework for monitoring the effects of the development plan document?</p>	<p>1. The Act section 35</p> <p>2. Regulation 48</p> <p>Reg 17 of The Environmental Assessment of Plans and Programmes Regulations 2004</p>	<p>1. PPS12 paragraphs 4.39 – 4.43 and 4.47</p> <p>2. SEA Guide, Chapter five</p> <p>3. Office of</p>		<p>i. Sustainability appraisal report</p> <p>ii. The annual monitoring report</p> <p>iii. Reports or documents setting out the appraisal and</p>	<p>The Core Strategy introduced a monitoring framework for the Colchester LDF. This will be developed further as part of the Site Allocations document and future documents which make</p>

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	No1363	the Deputy Prime Minister monitoring guide		monitoring framework	up the LDF. Each document when submitted will contain an extensive monitoring chapter which will become part of the examination in public. Work on the Sustainability Appraisal and the Annual Monitoring Report will also supplement the monitoring framework and guide the future production of policy documents.
10. Have you arranged to send copies of documents used in consultation to the Government Office and Planning Inspectorate?	Not statutory, but will assist in identifying issues leading towards a sound development plan document	Plan Making Manual - New Regulation 25		Copies of correspondence with the Government Office and Planning Inspectorate	The Council has kept in close contact with the Government Office during the formulation of the Site Allocations document and no general conformity issues have been raised. The Government Office

Activity	Legal Requirement	Guidance Reference	Additional Notes	Possible evidence	Evidence provided
					responded to the Regulation 25 consultation and these comments were taken into account and addressed in the Submission document.

Stage 3: Plan preparation - formulation phase

Activity	Statutory Requirement	Guidance reference	Additional Notes	Possible evidence	Evidence provided
14. Are you preparing reasonable alternatives for evaluation during the preparation of the development plan document?	Regulation 12 of The Environmental Assessment of Plans and Programmes Regulations 2004 No. 1633	1. PPS12 paragraph 4.38 2. SEA Guide, Chapter five	The sustainability appraisal report and supporting documents relevant to the preparation of the development plan document are part of the proposed submission documents (see Regulation 24)	Documents supporting decisions on alternatives and any preferred strategy	The Core Strategy adopted December 2008 outlines the strategic approach to development over the plan period and the Site Allocations document has to accord with this document. A number of alternative approaches to the Site Allocations document were considered inappropriate because they would not have accorded with the Core Strategy.
12. Have you assessed alternatives against: <ul style="list-style-type: none"> consistency with national policy general conformity with the regional 	The Act section 19(2), section 24	PPS12 4.30 – 33	General conformity with the regional spatial strategy is tested formally later but you need to consider it during preparation of the	i. Supporting documents ii. Correspondence with Government Offices and regional	The Site Allocations document is consistent with the Core Strategy which was found sound in October 2008. Officers met with the Government Office for

Activity	Statutory Requirement	Guidance reference	Additional Notes	Possible evidence	Evidence provided
spatial strategy?			development plan document	planning body (or Mayor of London)	the East of England in April 2009 and no major conformity issues were raised.
13. Are you having regard to: <ul style="list-style-type: none"> adjoining regional spatial strategies, the spatial development strategy for London, or Welsh Spatial Plan (as appropriate) the National Planning Framework for Scotland? 	1. The Act section19(2) 2. Regulation 15(1)(g)			i. Supporting documents ii. Correspondence with the relevant bodies	Colchester is located on the eastern edge of the East of England Region and therefore is not adjoined to any other area with a regional spatial strategy so it would be considered unnecessary to have regard to the London Plan, Welsh Spatial Strategy and the National Planning Framework for Scotland.
14. Are you having regard to: <ul style="list-style-type: none"> the sustainable community strategy of the authority or other authorities 	The Act section19(2)	PPS12 paragraphs 1.6; 4.22 - 4. 23; 4.34 - 4. 35		i. Supporting documents ii. The Sustainable community strategies	The Council is a key partner within the sustainable community strategy and officers along with members play an active role in the

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<p>whose area comprises part of the area of the council</p> <ul style="list-style-type: none"> any other local development documents adopted by the council? 				<ul style="list-style-type: none"> iii. Relevant local development documents iv. Correspondence with the local strategic partners 	<p>Sustainable Community Strategy. The Local Strategic Partnership (Colchester 2020) are invited to comment on all consultation documents and have raised no general conformity issues during the formulation of the document.</p>
<p>15. Do you have regard to other matters and strategies relating to:</p> <ul style="list-style-type: none"> resources the regional development agencies' regional economic strategy the local transport plan and transport facilities and services waste strategies 	<ol style="list-style-type: none"> The Act section 19(2) Regulation 15 		<p>As well as the matters and strategies listed in the Act and Regulations there are likely to be other matters identified in planning policy statements, regional and local strategies that you will need to have regard to in preparing the development plan document.</p>	<ul style="list-style-type: none"> i. Supporting documents ii. Correspondence with the relevant bodies and the Government Office 	<p>The Site Allocations document has had to have regard to a wide range of strategies and plans which deal specifically with associated infrastructure. Throughout the formulation of the document the Council has worked in partnership with Essex County Council to ensure that all issues</p>

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<ul style="list-style-type: none"> hazardous substances and accidents? 					regarding transport, waste and education are dealt with appropriately in the Colchester LDF. EERA have also been consulted at every stage of consultation and have raised no general conformity issues as outlined in the Statement of Consultation.
16. Are you having regard to the need to include policies on mitigating and adapting to climate change?		Annex to PPS1 on climate change	This is expected to be an amendment to section 19(2) of the Act.	Supporting documents	The Core Strategy introduced the issue of Climate Change and regard has been taken to this issue in the Site Allocations document which is in general conformity with the Core Strategy.
17. Have you undertaken the necessary	1. The Act section 19(5) 2. Regulation 12	1. PPS12 paragraphs 4.38 – 4.43	Regulation 13 of The Environmental Assessment of Plans	i. Reports on the sustainability of alternatives	During each consultation period the Council has also

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sustainability appraisal of alternatives, including consultation on the sustainability appraisal report?	and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633	2. SEA Guide, Chapter five	and Programmes Regulations 2004 No 1633 sets out the consultation procedures	<ul style="list-style-type: none"> ii. Record of work undertaken on sustainability appraisal iii. Supporting documents 	published a Sustainability Appraisal which has considered all reasonable alternatives. Details of consultation responses specifically on the Sustainability Appraisal can also be found in the Consultation Statement. Further specific details looking at the alternatives can be found in the final Sustainability Appraisal published alongside the Regulation 27 document.
18. Are you setting out clear reasons for any preferences between alternatives?	Regulation 13(1)	PPS12 paragraphs 4.36 – 4.38	This will include Information from the sustainability appraisal.	<ul style="list-style-type: none"> i. Any reports setting out alternatives and choices considered ii. Supporting documents 	Justification is provided within the document as well as being supported by a comprehensive evidence base which looks in greater detail at a range of alternatives.

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<p>19. Have you taken into account any representations made on the content of the development plan document and the sustainability appraisal?</p> <p>20. Are you keeping a record?</p>	<p>1. Regulations 24, 25(5) and 30(1)(d)(iv)</p> <p>2. Regulation 13(4) of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633</p>	<p>PPS12 paragraphs 4.19 – 4.29</p>	<p>Records on the sustainability appraisal should also include recording any assessment made under the Habitats Directive</p>	<p>i. Correspondence from those making representations</p> <p>ii. Any reports on issues raised</p> <p>iii. Consultation statement</p> <p>iv. sustainability appraisal report</p>	<p>All consultation responses are logged and reported to LDF Committee at the earliest opportunity. These responses are in the public domain and can be made available for viewing at any time upon request. The LDF Committee Reports from 17th March 2008 and 23rd March 2009 are contained within the consultation statement. Where deemed necessary the Council have undertaken further work in response to specific issues raised during the consultation period – for example the detailed review of Settlement Boundaries undertaken post Regulation 25 which is</p>

Activity	Statutory Requirement	Guidance reference	Additional Notes	Possible evidence	Evidence provided
					now forms part of the comprehensive evidence base.
<p>21. Where sites are to be identified or areas for the application of policy in the development plan document, are you preparing sufficient illustrative material to:</p> <ul style="list-style-type: none"> • enable you to amend the currently adopted proposals map • inform the community about the location of proposals? 	Regulations 9 and 14	PPS12 paragraphs 4.6 - 4.7; 8.1-8.3	<ol style="list-style-type: none"> 1. Regulation 2 defines the terms 'submission' and 'adopted' proposals map. 2. A map showing changes to the adopted proposals map is part of the proposed submission documents defined in Regulation 24. 	<ol style="list-style-type: none"> i. The adopted proposals map ii. Any reports on proposals to amend the proposals map iii. Illustrative material that shows how the proposals map will be amended or replaced 	The Local Plan Proposals Map formed the basis for the Site Allocations document. As the Site Allocations has been developed draft Proposals Maps have also been produced and taken to LDF Committee for approval prior to public consultation periods. Accompanying the Site Allocations consultation period is a full set of draft Proposals Maps which clearly set out the land allocations and designations for the Borough. The Proposals Map is also accompanied by a key sheet and table which

Activity	Statutory Requirement	Guidance reference	Additional Notes	Possible evidence	Evidence provided
					details which policies the allocations and designations relate to specifically.
22. Are the participation arrangements compliant with the statement of community involvement?	1. The Act, section 19(3) 2. Regulation 25	PPS12 paragraphs 4.19-4.29	You should make sure the arrangements remain in line with legislative changes affecting community engagement.	i. The statement of community involvement ii. Consultation statement	The Council undertakes each consultation period in accordance with the adopted SCI and no consultation issues have been raised at any stage.
23. Have you remained in close contact with the Government Office and discussed any emerging issues that might affect the soundness of the development plan document?		Plan Making Manual - New Regulation 25		i. Copies of correspondence with the Government Office ii. Copies of the relevant documents	The Council has kept in close contact with the Government Office during the formulation of the Site Allocations document and no general conformity issues have been raised. The Government Office responded to the Regulation 25 consultation and these comments were taken

Activity	Statutory Requirement	Guidance reference	Additional Notes	Possible evidence	Evidence provided
					into account and addressed in the Submission document.

Stage 4: Publication

Activity	Statutory Requirement	Guidance Reference	Additional notes	Possible evidence	Evidence provided
1. Have you prepared the sustainability appraisal report?	1. The Act section 19(5) 2. Regulation 12 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633	1. PPS12 paragraphs 4.38 – 4.43 2. SEA Guide Chapter five		Sustainability appraisal report	To accompany the Site Allocations Regulation 27 document the Council also published a Sustainability Appraisal which informed by previous scoping reports. The Sustainability Appraisal was made available from the beginning of the consultation period.
2. Have you made clear where and within what period representations must be made?	Regulation 28(2) and (3)		The period must be at not less than 6 weeks from when you give notice under Regulation 27(e) (see below)	i. Report or record of decisions ii. The statement of community interest	The Site Allocations document contained a representation form with clear instructions and dates to assist with the consultation period.
3. Have you made copies of the following available for inspection:	Regulation 27(a)		Regulation 24 gives definitions	i. Copies of the relevant statements ii. Report on	At the start of every consultation period the Council ensures that the documents are

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<ul style="list-style-type: none"> the proposed submission documents? the statement of the representations procedure? 				<p>where and when made available</p> <p>iii. Record of where and when made available</p>	<p>available for viewing on the Council's website as well as Customer Service Centre and the local libraries as outlined in the SCI. Alongside these documents there is always representation forms available which give full details of the consultation. Details of where the documents can be seen are also always included in the Statutory Advert which is placed in the local press at the beginning of a consultation period.</p>
<p>4. Have you published on your website the following:</p> <ul style="list-style-type: none"> the proposed submission 	Regulation 27(b)		Regulations 2 and 24 give definitions	Record of publication	<p>At the beginning of the consultation period (Friday 18th September 2009) the Council made all documents</p>

Activity	Statutory Requirement	Guidance Reference	Additional notes	Possible evidence	Evidence provided
documents? • the statement of the representations procedure? • statement and details of where and when documents can be inspected?					publically available in line with the Statement of Community Involvement.
5. Have you sent to each of the specific consultation bodies invited to make representations under Regulation 25(1): • A copy of each of the proposed submission documents • The statement of the representations procedure?	Regulation 27(c)		Regulations 2 and 24 give definitions	i. Copies of correspondence ii. Record of sending	As the Site Allocations document considers the entire Borough it was deemed necessary to notify everybody on the LDF Contact Database. Every organisation on the specific consultation bodies' database was consulted in accordance with the Regulations and the Statement of Community Involvement.

Activity	Statutory Requirement	Guidance Reference	Additional notes	Possible evidence	Evidence provided
<p>6. Have you sent to each of the general consultation bodies invited to make representations under Regulation 25(1):</p> <ul style="list-style-type: none"> the statement of the representations procedure? where and when the documents can be inspected? 	Regulation 27(d)		Regulations 2 and 24 give definitions	<ul style="list-style-type: none"> i. Copies of correspondence ii. Record of sending 	As the Site Allocations document considers the entire Borough it was deemed necessary to notify everybody on the LDF Contact Database. Every organisation on the general consultation bodies' database was consulted in accordance with the Regulations and the Statement of Community Involvement.
<p>7. Have you given notice by local advertisement setting out:</p> <ul style="list-style-type: none"> the statement of the representations procedure where and when the 	Regulation 27(e)		Regulation 24 gives definitions	<ul style="list-style-type: none"> i. Copy of advertisement ii. Where and when placed 	A public notice was placed in the Essex County Standard at the start of the consultation period on Friday 18 th September 2009. The public notice outlined all the consultation arrangements and

Activity	Statutory Requirement	Guidance Reference	Additional notes	Possible evidence	Evidence provided
documents can be inspected?					details of where the documents could be viewed.
8. Have you requested the opinion of the regional planning body (or the Mayor in London) on the general conformity of the development plan document with the regional spatial strategy (or spatial development strategy)?	1. The Act section 24 2. Regulation 29	PPS12 paragraph 4.21	The period is six weeks from when you make copies available for inspection under Regulation 27(a)	Copies of correspondence	The East of England Regional Assembly (EERA) have been consulted at every stage of the Site Allocations document. When the submission documents were published under Regulation 27 a request was sent to EERA for their opinion on the general conformity of the Site Allocations DPD with the East of England Plan.

Soundness

Key question	Possible evidence	Evidence provided
Justified		
Participation		
1. Has the consultation process allowed for effective engagement of all interested parties?	The consultation statement	The Site Allocations document has been through three rounds of public consultation (Issues and Options November 2007, Regulation 25 January 2009, Regulation 27, September 2009). All stakeholders, parish council's, local residents, local businesses have had the opportunity to provide comments in line with the adopted Statement of Community Involvement. Further details on the consultation process are included within the Site Allocations Consultation Statement.
Research/ fact finding		
2. Is the content of the development plan document justified by the evidence? 3. What is the source of the evidence? 4. How up to date and convincing is it?	<ul style="list-style-type: none"> i. Sections of the development plan document which show how the evidence points towards the selected strategy, policies or proposals ii. Sections of the pre-submission proposals documents iii. Sections of the preferred strategy report iv. Sections of the sustainability appraisal report which set out its main conclusions in relation to 	The Core Strategy was adopted in December 2008 and the Site Allocations document is considered to be in conformity with the Core Strategy. A large number of the evidence base documents produced for the Core Strategy are still relevant and up to date. Therefore these have been used again to inform the Site Allocations document.

Key question	Possible evidence	Evidence provided
	<p>the policies in the development plan document</p> <p>v. Sections of the consultation statement</p> <p>OR</p> <p>A very brief statement of how the main findings of consultation support the policies, with reference to:</p> <ul style="list-style-type: none"> ○ reports to the council on the issues raised during participation, covering both the front-loading and formulation phases ○ any other information on community views and preferences <p>vi. The studies, reports and technical papers that provide the evidence for the policies set out in the development plan document. The date of preparation and who they were produced by should be signposted</p> <p>OR</p> <p>For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the</p>	<p>The SHLAA and the Employment Land Study are key evidence base documents that informed the Site Allocations document along with more recent studies which have been undertaken recently such as the Local Wildlife Sites Study, Historic Environment Characterisation Project and an update to the Hotel Demand Study.</p> <p>Alongside each stage of public consultation the Council has published a Sustainability Appraisal for comment. The SA and earlier scoping reports informed the production of the Site Allocations document and provides further detailed justification with regards to the approach taken.</p> <p>The Site Allocations Consultation Statement provides details of all the responses received during the previous rounds of public consultation which demonstrates the front loading that has taken places as well as the range of stakeholders and organisations who have responded to the Site Allocations document.</p>

Key question	Possible evidence	Evidence provided
	reasoned justification in the development plan document)	
<p>5. What assumptions had to be made in preparing the development plan document?</p> <p>6. Are the assumptions reasonable and justified?</p>	<p>i. Sections of the development plan documents setting out the assumptions</p> <p>ii. Sections of the sustainability appraisal report setting out the assumptions</p> <p>iii. A very brief statement for each assumption as to how the evidence led to the assumption</p> <p>iv. Reference to national or regional policy, correspondence from bodies consulted or technical papers that provide the basis for assumptions</p>	<p>The Site Allocations document conforms with the Core Strategy and other documents which make up the Colchester Borough Council Local Development Framework. The adopted Core Strategy provided an up to date strategic context from which to begin work and address the site specific issues which deliver the Core Strategy targets and objectives.</p> <p>As well as being in accordance with the Core Strategy the Site Allocations document takes account of the relevant national and regional planning policies which provide further context and a series of assumptions. The Sustainability Appraisal which accompanies the Site Allocations document also sets out the realistic options available and has guided the development of the document further as a result.</p>
Alternatives		
<p>7. Can it be shown that the council's chosen approach is the most appropriate given the reasonable</p>	<p>i. Sections of the consultation statement showing how the community was involved in considering issues, alternatives and options</p> <p>ii. Documents used in community involvement with stakeholders and communities</p>	<p>The Site Allocations document has been subject to three rounds of consultation which has guided the Council's approach. All realistic and deliverable alternatives have been considered against a range of sustainability criteria and sequential tests with regards to site selection.</p>

Key question	Possible evidence	Evidence provided
<p>alternatives?</p> <p>8. Have realistic alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at?</p> <p>9. Where a balance had to be struck in taking decisions between competing alternatives is it clear how and why these decisions were made?</p>	<p>encouraging them to identify the issues and options they wished to see considered</p> <p>iii. Any report produced at the end of the front loading phase of plan preparation setting out the issues and options raised</p> <p>iv. Sections of the preferred strategy report explaining:</p> <ul style="list-style-type: none"> • how alternatives were developed and evaluated, and • why alternatives were rejected in favour of the preferred strategy <p>v. Sections of the sustainability appraisal report showing the options and alternatives and explaining how they were objectively assessed</p> <p>vi. Reports prepared during the plan preparation process (including after the preferred strategy participation) contributing to the decisions made on the inclusion of policies in the development plan document</p> <p>vii. Sections of the consultation statement explaining how the main findings of consultation support the decisions</p> <p>viii. Sections of the representations statement</p> <p>OR</p> <p>A brief statement of the influence upon</p>	<p>The site selection process has ensured consistency as well as providing a justified and effective method on which to base decisions.</p> <p>The Site Allocations Consultation Statement outlines the consultation that the Council undertook and contains details of the responses which have guided the approach to the document. Where appropriate analysis of the consultation responses has been possible these details are also included within the Consultation Statement.</p> <p>The Regulation 25 document outlines the site which were supported and those which had been discounted at that stage. Details of the reasons for and against the sites were shown along with further justification regarding the approach that had been taken. The Regulation 25 document was also supported by a Revised Scoping Report which provided further justification for the Council's chosen approach.</p> <p>The evidence base contains a number of documents which support the Council's approach. A key document is the Settlement</p>

Key question	Possible evidence	Evidence provided
	<p>decisions of:</p> <ul style="list-style-type: none"> the issues raised during stakeholder and community engagement, and how they have been addressed ix. Any other documentation showing how alternatives were developed and evaluated x. A very brief statement and any other supporting documentation of the way decisions have been taken 	<p>Boundary Review which has provided justification and further clarity of the approach taken to site selection in the rural areas as outlined in the Core Strategy. The Settlement Boundary Review considered the sites put forward against the housing targets within the Core Strategy and proposed Settlement Boundaries to be used within the Site Allocations document.</p>
<p>10. Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the development plan document from the start?</p>	<ul style="list-style-type: none"> i. A structure to the development plan document which reports the sustainability appraisal findings in relation to each policy ii. Sections of the sustainability appraisal report which set out how sustainability appraisal has influenced the development of the preferred strategy and how policies have been revised in the light of sustainability appraisal findings iii. Reports made as part of plan-making which indicate how sustainability appraisal has influenced the choice of strategy and the content of policies 	<p>At each consultation stage of the Site Allocations document the Council have published a Sustainability Appraisal to accompany and inform the document. The Sustainability Appraisal has been a key document in determining the most appropriate approach. The Sustainability Appraisal which accompanies the Site Allocations Submission document provides details for each site which has been considered to be a realistic option.</p> <p>The links between the Site Allocations document and the appropriate Sustainability Appraisal have been clearly outlined in the introduction and explanation of each document at every stage of consultation.</p>

Key question	Possible evidence	Evidence provided
<p>11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it?</p> <p>12. Does the strategy take forward the regional context reflecting the local issues and objectives?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document which explain where and how regional guidance has been elaborated upon and the reasons ii. The regional development agency/regional planning body letter confirming that the development plan document is in general conformity with the regional special strategy iii. Representations received from the regional development agency/regional planning body iv. Representations from the Government Office v. Reports or copies of correspondence as to how the representations have been considered and dealt with 	<p>The East of England Regional Assembly (EERA) has been consulted at each stage of the Site Allocations document. To date no general conformity issues have been raised by EERA and further details are outlined within the Consultation Statement.</p> <p>The Government Office for the East of England have played an active role in the Site Allocations document and have provided consultation responses which are detailed in the Consultation Statement. In April 2009, officers met with the Government Office to discuss further progress and no major issues were raised.</p> <p>The East of England Plan and the Core Strategy both provide strategic guidance and these have been expanded to provide local level detail as required. The Site Allocations document considers the relevant policies and elements of the East of England Plan and draws the key issues down to the local level. Each section of the Site Allocations provides a regional context as well as a Core Strategy context which the Council considers appropriate when focusing on the local issues and objectives.</p>

Effective		
Deliverable		
<p>13. Has the council clearly identified what the issues are that the development plan document is seeking to address?</p> <p>14. Have priorities been set so that it is clear what the development plan document is seeking to achieve?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document which refer to the vision and objectives of the sustainable community strategy and the issues identified there ii. A statement prepared following stakeholder and community engagement in the front-loading phase of plan-making setting out the identified issues for the development plan document A spatial portrait based on the advice in 'Policies for spatial plans' presented as part of the core strategy iii. A core strategy vision which is framed to set out the outcomes which are sought for the future iv. Sections of the development plan document which identify the main issues addressed v. Sections of the development plan document which indicate the priority outcomes 	<p>The Issues and Options report considered a range of broad issues which were appropriate when compared to the Core Strategy (which was at an advanced stage). The Issues and Options Report started the debate with regards to the future policy direction the Site Allocations document could take and still be in accordance with the Core Strategy. The Spatial Vision within the Core Strategy was a key driving force behind the direction of the Site Allocations document and set the priorities that the Site Allocations had to meet.</p>
<p>15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately</p>	<ul style="list-style-type: none"> i. Sections of the regional special strategy which identify cross-boundary issues. ii. Sections of the development plan document setting out cross-boundary issues and the 	<p>The Council is bordered by a number of local authorities and all neighbouring authorities have been consulted at each stage of the Site Allocations document. Colchester is part of the Haven Gateway Partnership which includes a</p>

addressed?	<p>response to them</p> <ul style="list-style-type: none"> iii. Reports on relevant studies which cover wider areas than the local authority and how the development plan document addresses their findings or recommendations iv. Records of meetings with adjoining authorities or relevant agencies which confirm that there are no cross-boundary issues of significance 	<p>number of neighbouring authorities and no cross boundary issues have been raised. The Site Allocations document identifies the Betts Factory, Ipswich Road as a site for Mixed Use Redevelopment and part of this site is within Tendring District Council. As a result the redevelopment of this site will need to be undertaken in partnership with the neighbouring authority and this has been identified within the document. As part of the LDF Colchester has undertaken a number of evidence base studies and some of these have been in partnership with neighbouring authorities which has ensured that any cross boundary issues have been resolved early in the process.</p>
16. Does the development plan document contain clear objectives?	<ul style="list-style-type: none"> i. A spatial portrait which identifies the key issues facing the area ii. A core strategy vision which is framed to set out the outcomes which are sought for the future iii. The strategic objectives of the development plan document, and the commentary in the development plan document of how they derive from the spatial portrait and vision 	<p>The Core Strategy contains the Spatial Strategy for the Borough up to 2021. The Site Allocations document supports the Core Strategy and is therefore considered to be in accordance with the higher level document and contains the same clear objectives. Each section of the Site Allocations document clearly demonstrates the links to the Core Strategy and its objectives.</p>
17. Are the objectives specific to the place; as opposed to being general and	<ul style="list-style-type: none"> i. The spatial portrait and the commentary in the development plan document as to how the objectives derive from it 	<p>The Site Allocations document looks specifically at each of the Growth Areas in the Borough and deals specifically with the objectives for each of these. The Spatial Vision of the Core Strategy</p>

<p>applicable to anywhere?</p> <p>18. Is there a direct relationship between the identified issues and the objectives?</p>	<p>ii. Confirmation from the local strategic partnership and partner organisations that they agree the objectives as being specific to the place</p>	<p>outlines the regeneration projects in the Borough as well as providing for the social and environmental needs of the Borough. The Site Allocations document provides further details with regards to the relationship between the priorities in the Spatial Vision and overall objectives of the Core Strategy and the Site Allocations.</p>
<p>19. Is it clear how the policies will meet the objectives?</p> <p>20. Are there any obvious gaps in the policies, with regard to the objectives of the development plan document?</p>	<p>i. Relevant sections of the development plan document which explain how policies derive from the objectives and are designed to meet them</p> <p>ii. Relevant sections of the sustainable community strategy which identify its objectives</p> <p>iii. Confirmation from the local strategic partnership and partner organisations that they believe the policies will achieve the agreed objectives</p> <p>iv. Research reports and studies which address the means to address objectives and conclude that the policies are appropriate and should succeed</p> <p>v. Sections of the development plan document, reports or other documents which discuss the matters which should be addressed in the development plan document.</p>	<p>The local strategic partnership (Colchester 2020) confirmed that they agreed with the objectives and spatial portrait set out within the Core Strategy. No specific comments have been received from the local strategic partnership to the Development Policies DPD.</p> <p>The policies encourage development within the most sustainable locations in accordance with the overarching spatial strategy set by the Core Strategy.</p>

<p>21. Are there realistic timescales related to the objectives?</p>	<ol style="list-style-type: none"> i. Sections of the development plan document which address delivery and the timescales for key developments and initiatives ii. Confirmation from the local strategic partnership and partner organisations that the timescales are realistic in terms of their contribution to delivery 	<p>The Core Strategy and the Site Allocations document outline the timescales of delivery. The Housing Trajectory along with the Infrastructure Trajectory is key documents which were agreed during the Core Strategy Examination in Public and these have been kept up to date to ensure that realistic timescales are in place. The Local Strategic Partnership among other partner organisations has raised no general conformity issues so the Council is confident that timescales are realistic for delivering the objectives.</p>
<p>22. Are the policies internally consistent?</p>	<ol style="list-style-type: none"> i. Sections of the development plan document, documents used in community involvement, and technical papers which demonstrate that the objectives are consistent ii. A very brief statement explaining how the council considers its objectives are consistent 	<p>The Site Allocations document takes its lead from the Core Strategy and is therefore considered to be consistent and in accordance with the development plan document already adopted. Each section of the Site Allocations considers the Core Strategy and places the policies within it under the context set out in the Core Strategy.</p>
<p>23. Does the development plan document contain material which:</p> <ul style="list-style-type: none"> • is already in another plan • should be 	<ol style="list-style-type: none"> i. Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each development plan document. This should show how they combine to provide a coherent policy structure ii. Representations from the Government Office 	<p>The Core Strategy sets the strategic framework for the Borough and the Site Allocations provides more site specific details with regards to future developments and growth of the Borough over the plan period. The Local Development Scheme indicates the role of the Site Allocations document and the Council are confident that it is fit for purpose and meets the</p>

<p>logically be in a different plan</p> <ul style="list-style-type: none"> • should not be in a plan at all? 	<p>iii. Reports or copies of correspondence as to how the representations have been considered and dealt with</p>	<p>description in the Local Development Scheme. The Site Allocations document adequately fills the policy gap between the Core Strategy and a suite of Supplementary Planning Documents and Master Plans envisaged for specific sites and areas across the Borough.</p>
<p>24. Does the development plan document explain how its key policy objectives will be achieved?</p>	<p>i. Sections of the development plan document that identify the key objectives and how they will be delivered upon</p> <p>ii. Confirmation from the relevant agencies that they support the objectives and the identified means of delivery</p> <p>iii. Other supporting material – for example, commitments in the local area agreement that will support the delivery of the strategy in the development plan document</p>	<p>The key policies and objectives of the LDF are contained within the adopted Core Strategy and further site specific details are given for these in the Site Allocations document. The individual chapters in the Site Allocations document contain the relevant key objectives and policies contained within the Core Strategy to ensure consistency between documents within the LDF. During the early rounds of consultation on the Site Allocations no issues regarding the delivery of objectives have been raised.</p>
<p>25. If there are development management policies, are they supportive of the strategy and objectives?</p>	<p>i. Sections of the development plan document that show how the development management policies:</p> <ul style="list-style-type: none"> • will help to deliver the strategy <p>37. derive from, and elaborate on, the objectives and policies of the plan</p>	<p>The Site Allocations document provides a range of policies which are intended to help guide the future and more detailed development of certain areas and sites. Where appropriate the policies within the Site Allocations document once adopted are to be used in the determining of future planning applications.</p>
<p>26. Have the infrastructure implications of the</p>	<p>i. A section or sections of the development plan document where infrastructure needs are identified and the proposed solutions put</p>	<p>As part of the Core Strategy the Council undertook a range of work which considered the infrastructure requirements across the Borough</p>

strategy/policies clearly been identified?	<p>forward</p> <ul style="list-style-type: none"> ii. Representations in respect of infrastructure iii. Reports or copies of correspondence as to how representations in relation to infrastructure have been considered and dealt with 	<p>over the plan period. The Site Allocations document builds further on this work specifically within the Growth Areas and provides clearer detail and evidence as to how the associated infrastructure will be delivered. The Council has worked in partnership with a range of stakeholders including Essex County Council, the Highways Agency and landowners to ensure that the appropriate level of infrastructure is provided alongside future developments. The Consultation Statement outlines the representation received and clearly shows that key stakeholders have been involved throughout the entire process.</p>
27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?	<ul style="list-style-type: none"> i. Sections of the development plan document setting out delivery mechanisms and timescale ii. Other development plan documents being prepared that develop the policies of the core strategy further and set out how they will be delivered iii. Research or studies that address matters of delivery and the realistic timescales iv. Documents that set out arrangements made or planned for local delivery vehicles, or other delivery mechanisms v. Very brief statements on how other stakeholders intend to support the delivery of the policies, with any supporting 	<p>The Core Strategy is the key driver in the identification of the delivery mechanisms and the implementation of policies within the Colchester LDF. During the Core Strategy Examination in Public the Council agreed a series of Statements of Common Ground with key stakeholders and partners which outlined commitments from both parties to ensure that the timescales of implementation were consistent. The Site Allocations document builds on these agreements and ensures that the necessary arrangements are in place before a site is developed. As part of the developments expected within the Growth Areas the Site Allocations document seeks a wide range of</p>

	<p>correspondence or reports by the authority or the relevant stakeholder</p> <p>vi. Correspondence from stakeholders on delivery mechanisms and timescale</p> <p>vii. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with</p>	<p>partnership working and arrangements to deliver the level of development required alongside the necessary infrastructure.</p>
<p>28. Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies?</p>	<p>i. Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery</p> <p>ii. Representations in respect of infrastructure</p> <p>iii. Reports or copies of correspondence on how representations in relation to infrastructure and its timing have been considered and dealt with</p>	<p>The Site Allocations document contains a range of policies which deal specifically with the infrastructure requirements over the plan period. These policies detail the delivery mechanisms for the infrastructure and were supported by landowners, developers and the local authority at Core Strategy stage through Statements of Common Ground. The agreements reached during the Core Strategy are still relevant and have been used to ensure that the necessary infrastructure is provided during the plan period.</p>
<p>29. Is it clear who is intended to implement each part of the strategy/development plan document?</p> <p>30. Where actions required to</p>	<p>i. Sections of the development plan document setting out responsibilities for delivery</p> <p>ii. Correspondence showing how other stakeholders intend to support the delivery of the policies</p> <p>iii. Reports by the council or the relevant stakeholder</p> <p>iv. Representations from stakeholders on</p>	<p>The Council works in partnership with a wide range of organisations, stakeholders and individuals to deliver the aims and objectives of the Colchester LDF. The Site Allocations document continues this partnership approach and this is demonstrated by stakeholder responses to previous rounds of public consultation. During the formulation of the Site Allocations submission document further work</p>

implement policy are outside the direct control of the council, is there evidence of commitment from the relevant organisation to implement the policies?	<p>implementation</p> <p>v. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with</p>	has been undertaken with all stakeholders to ensure that the necessary project implementation will take place over the plan period.
<p>31. Does the development plan document reflect the concept of spatial planning?</p> <p>32. Does it go beyond traditional land use planning by bringing together – and integrating – policies for development, and the use of land, with other policies and programmes from a variety of organisations that influence the nature of places and how they function?</p>	<p>i. Sections of the development plan document that reflect the plans or strategies of other bodies</p> <p>ii. Expressions of support from bodies responsible for other strategies affecting the area</p> <p>iii. Representations in respect of services provided by other agencies</p> <p>iv. Reports or copies of correspondence as to how the representations have been considered and dealt with. These should either clarify the issues raised in the representation, or include a copy of the substance of the representation</p>	The Site Allocations document reflects the concept of spatial planning by encouraging development in the most sustainable locations, and contains generic criteria-based area specific policies. The Core Strategy and the Site Allocations document have both been prepared in partnership with a wide range of stakeholders including the Highways Agency and Essex County Council and accurately reflects a variety of supporting infrastructure which will be needed to ensure a truly spatial plan is delivered. Further elements of the LDF including future Area Action Plans are also likely to demonstrate the linkages between the Council and stakeholders as well as ensuring the LDF goes beyond the traditional land use planning.
33. Does the	i. Explicit recognition within the development	The Site Allocations document currently reflects

development plan document take into account matters which may be imposed by circumstance, notwithstanding the council's views about the matter?	<p>plan document that this may happen, and clear information about how the plan strategy can accommodate them</p> <p>ii. Consideration of the options in relation to such matters as part of the evaluation of alternatives in a report on the preferred strategy</p>	national policy and is considered to be in general conformity with national and regional level policy documents. Should any significant changes take place which are imposed by circumstance it may be necessary to review the Site Allocations document earlier than envisaged.
Flexible		
34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?	<p>i. Sections of the development plan document setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed</p> <p>ii. Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor:</p> <ul style="list-style-type: none"> the effectiveness of policies and what evidence is being collected to undertake this changes affecting the baseline information and any information on trends on which the development plan document is based <p>iii. Statements or correspondence from stakeholders which commit to providing information to be used in monitoring the progress of the policies and changes in the baseline</p>	Flexibility has been factored into the Site Allocations document to ensure that the Council can respond to a range of unexpected changes and circumstances over the plan period. The Core Strategy sets the targets for housing and employment delivery and these are interpreted as specific sites within the Site Allocations document. For each area the Council has insured that the land allocated is over and above the minimum target agreed in the Core Strategy. The Council will continually monitor the progress of the document over the plan period to ensure that delivery is still on target when compared to the trajectories which support the LDF. Green field allocations are expected to contribute towards housing delivery post 2016 but the Site Allocations has built in flexibility to allow these sites to come forward earlier in the plan period if

	iv. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances	monitoring suggests there is a need. The Sustainability Appraisal has also considered the flexibility and timing of site delivery and has not identified any detrimental issues. The Council will continue to produce the Annual Monitoring Report when the Site Allocations document is adopted and this will be a key document in assessing its flexibility.
35. Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional special strategy?	<ul style="list-style-type: none"> i. Sections within the development plan document dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision ii. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances 	The Core Strategy was adopted in accordance with the East of England Plan and provides sufficient land to meet the current regional targets. Any significant changes to the East of England Plan are likely to require a review of all documents which make up the Colchester LDF which is outlined the Council's Local Development Scheme. The Site Allocations document has allocated more than enough land to meet the minimum regional targets, so mechanisms have been integrated into the document to ensure that by the end of the plan period a level over and above the minimum targets have been reached.
36. Does the development plan document include the remedial actions that will be taken if the strategies/policies	<ul style="list-style-type: none"> i. A section of the development plan document which expressly addresses flexibility ii. Sections of the development plan document identifying the key indicators of success of the strategy, and the remedial actions which will 	The Annual Monitoring Report will assess the progress as well as success (or failure) of the Site Allocations document as part of the Colchester LDF. If continual monitoring indicates that the strategy and or policies are not performing as originally intended then the

are failing?	be taken if they are failing	Council will have to consider alternative approaches which may result in an earlier review of the appropriate document(s) then previously planned.
Monitoring		
37. Does the development plan document contain targets and milestones that relate to the delivery of the policies, including housing trajectories where the plan contains housing allocations?	<ul style="list-style-type: none"> i. Sections of the development plan document setting out indicators, targets and milestones ii. Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories iii. Reference to any other reports or technical documents which contain information on the delivery of policies 	The Site Allocations document in accordance with the Core Strategy contains further detail with regards to the phasing and delivery of housing over the plan period. Developments within the Growth Area are to be delivered in line with the housing trajectory unless monitoring indicates that land needs to be released earlier in the plan period. The Core Strategy and the Site Allocations document both provide a level of flexibility which will allow the Council to ensure that targets are still met even if factors outside of the Council's control result in delays on site delivery.
38. Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?	<ul style="list-style-type: none"> i. Sections of the development plan document setting out indicators, targets and milestones ii. Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the development plan document against the sustainability appraisal iii. Reference to any other reports or technical 	Monitoring is a key part of the LDF and the Site Allocations document contains a monitoring section as required with any Development Plan Document. The links between the Site Allocations, the Core Strategy and the Annual Monitoring Report are identified and will form part of a wider programme of monitoring as the LDF evolves further. The Sustainability Appraisal also considers the monitoring element

	documents which contain information on the collection or measurement of indicators	of the Site Allocations and looks at the wider implications of progressing without an up to date plan in place.
39. Are suitable targets and indicators present (by when, how and by whom)?	<ul style="list-style-type: none"> i. Sections of the development plan document setting out indicators, targets and milestones ii. Sections of the current annual monitoring report that report on indicators, targets, milestones and trajectories 	The Annual Monitoring Report is the Council's primary tool used for monitoring the progress of the Local Development Framework. Further details are outlined within a monitoring framework in the Core Strategy and the Site Allocations builds upon this framework and will be used to monitor the progress of the Site Allocations document. A Monitoring section is included within the Site Allocations document which provides further detail and context.

National policy		
<p>40. Does the development plan document contain any policies or proposals that are not consistent with national planning policy?</p> <p>41. If yes, is there a local justification?</p>	<ul style="list-style-type: none"> i. Sections of the development plan document which refer to planning policy statements and justify why any policies are not consistent with national policy ii. Sustainable community strategy, studies forming evidence for the development plan document or other information which provide the stimulus for departing from national planning policy iii. Evidence provided from the sustainability appraisal (including reference to the 	Each section of the Site Allocations document considers the national policy context and outlines the documents at a national level which are considered appropriate for consideration within that section. The Council consider the Site Allocations document to be consistent with national and regional policy and as outlined in the Consultation Statement no general conformity issues have been identified by the Government Office.

	<p>sustainability report) and/or from the results of community involvement</p> <p>iv. Representations from the Government Office on the preferred strategy or the submitted development plan document</p> <p>v. Reports or copies of correspondence as to how Government Office representations have been considered and dealt with</p>	<p>The Sustainability Appraisal which accompanies the Site Allocations document also considers national policies and has not raised any issues of inconsistency with national planning policy.</p>
<p>42. Does the development plan document contain policies that do not add anything to existing national guidance?</p> <p>43. If so, why have they been included?</p>	<p>i. Sections of the development plan document which explain where and how national policy has been elaborated upon and the reasons</p> <p>ii. Representations from the Government Office</p> <p>iii. Reports or copies of correspondence as to how the representations have been considered and dealt with</p>	<p>The Site Allocations document provides local detail and local distinctiveness which builds upon the broader objectives contained within national planning policy. In circumstances where national policy is considered appropriate the Council will rely on the national planning policy as opposed to repeating guidance contained elsewhere.</p>